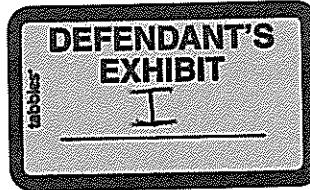


Barbara Brown

10/11/2006

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UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS



-----x  
IAN BROWN, JAMES BROWN and  
BARBARA BROWN,

Plaintiffs,

-against- Civil Action  
No. 04cv1192-RGS

UNITED STATES OF AMERICA, VERIZON  
NEW ENGLAND, INC., and BOSTON  
EDISON COMPANY d/b/a NSTAR ELECTRIC,

Defendants.

-----x  
October 11, 2006  
9:48 a.m.

Deposition of BARBARA BROWN, taken by the  
Defendants, pursuant to notice, held at  
Manheimer & Charnas LLP, 747 Third Avenue,  
New York, New York, before Tracy Eckhoff, a  
Shorthand Reporter and Notary Public within and  
for the State of New York.

Barbara Brown

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BARBARA BROWN**Q. Or his utility bills or insurance?****A. No.****Q. So before his accident, you didn't provide any financial support to Ian?****A. No.****Q. Now, after the accident -- I'm sure the accident had -- well, changed your relationship with Ian to some extent. And can you just talk a little bit about how the relationship changed after the accident.****A. Upon Ian's injury, my role had been mom. From the date of his injury throughout the next half year or more, I became caregiver, cheerleader, punching bag, family litigator, roles I never envisioned for myself, but Ian helped me become a better, stronger version of myself.****Q. Do you think the accident brought you and Ian closer together?****A. I do.****Q. We sat with Ian for almost two days, and he's like one of the most positive people I've ever seen. We deposed Ms. Gagne and we learned a little bit more about Ian and who he is. I'm wondering if you'd talk a little bit about a side**

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**BARBARA BROWN**

Okay.

3 And he's really fine, but those are  
4 the physical types of assistance that I'm able to  
5 give him.

6 **Q. Do you consider Ian to be emotionally  
7 dependent on you?**

8 A. No.

9 **Q. Now, I believe that -- do you know  
10 how much Ian receives from the federal government  
11 every month?**

12 A. I do not.

13 **Q. Do you know how much approximately he  
14 receives?**

15 A. I do not.

16 **Q. Does Ian contribute to the household  
17 expenses?**

18 A. He does.

19 **Q. In what way does he contribute to the  
20 household expenses?**

21 A. He contributes towards a  
22 budget-planned electrical bill, budget-planned gas  
23 bill, and he purchases the food at the commissary  
24 for us, for the household.

25 **Q. Does he pay the entire gas and**

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**BARBARA BROWN****electric bill?**

A. He does.

**Q. And he pays for all the food?**A. He does. He pays for the majority of  
the food.**Q. Do you give Ian an allowance of any  
sort?**

A. No.

**Q. Do you pay for Ian's school?**

A. Excuse me?

**Q. Do you pay for his school? I'm  
sorry.**

A. No.

**Q. How about Ian's clothing?**A. Gifts occasionally, you know. He's a  
clothes horse.**Q. But he generally buys his own  
clothes?**

A. He does. He does.

**Q. So Ian is not financially dependent  
on you?**

A. No.

**Q. Do you know if Ian has been exploring  
living on his own?**

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**BARBARA BROWN**

A. I'm sorry, Josh. Again.

Q. Sorry.

Do you know if Ian has been exploring  
living on his own outside of your house?

A. I do not know.

Q. Did you receive any money -- or did  
Ian contribute any money for the modifications you  
made to your home?

A. No.

Q. Are you aware that Ian at one point  
in his lifetime will have provided to him by the  
federal government the expense necessary to  
retrofit a residence for him?

A. The question again, Josh. I'm sorry.

Q. It was terrible.

A. No. No.

Q. Are you aware that the federal  
government will provide to Ian the expenses  
necessary to retrofit a residence for him?

A. For Ian?

Q. Yes.

A. I believe so.

Q. Do you know if Ian has any plans to  
take advantage of that?